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4 Attorneys for Defendants
Burnes, Gallemore, Gamboa, Garcia, Loza,
Maytubby, Munoz and Pena

[Counsel for Plaintiff on signature page]

21 DORA SOLARES.

22 Plaintiff,

23

24 RALPH DIAZ, et al.,

25 Defendants.

Case No.: 1:20-CV-00323-LHR-BAM

**STIPULATED AMENDED
SCHEDULING AND DOCKET
CONTROL ORDER; AND ORDER
THEREON**

Hon. Lee H. Rosenthal

1 Defendants Burnes, Gallemore, Gamboa, Garcia, Loza, Maytubby, Munoz, and Pena and
2 Defendant Silva and Plaintiff Solares hereby stipulate and submit the following proposed amended
3 schedule to control the above-listed matter:

4 1. March 31, 2025

5 **MEDIATION**

6 Mediation or other form of dispute resolution
7 must be completed by this deadline.

8 2. April 15, 2025

9 **COMPLETION OF NON-EXPERT**
10 **DISCOVERY**

11 Written discovery requests are not timely if
12 they are filed so close to this deadline that
13 under the Federal Rules of Civil Procedure the
14 response would not be due until after the
15 deadline.

16 3. April 29, 2025

17 **EXPERTS ON MATTERS OTHER THAN**
18 **ATTORNEYS' FEES**

19 The plaintiff (or the party with the burden of
20 proof on an issue) will designate expert
21 witnesses in writing and provide the report
22 required by Rule 26(a)(2) of the Federal Rules
23 of Civil Procedure.

24 4. May 30, 2025

25 **OPPOSING EXPERTS**

26 The opposing party will designate expert
27 witnesses in writing and provide the report
28 required by Rule 26(a)(2) of the Federal Rules
// of Civil Procedure.

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CLOSE OF EXPERT DISCOVERY

PRETRIAL DISPOSITIVE MOTIONS
DEADLINE

No motion may be filed after this date except
for good cause.

1 7. August 22, 2025

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JOINT PRETRIAL ORDER AND
MOTION IN LIMINE DEADLINE

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The Joint Pretrial Order will contain the pretrial disclosures required by Rule 26(a)(3) of the Federal Rules of Civil Procedure. Plaintiff is responsible for timely filing the complete Joint Pretrial Order. Failure to file a Joint Pretrial Order timely may lead to dismissal or other sanction in accordance with the applicable rules.

8. September 5, 2025

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DOCKET CALL

Docket Call will be held at 2:00 p.m. in a location to be determined. No documents filed within 7 days of the Docket Call will be considered. Pending motions may be ruled on at docket call, and the case will be set for trial as close to the docket call as practicable¹.

Any party wishing to make any discovery motions should arrange for a pre-motion conference with the court before the preparation and submission of any motion papers. That includes a motion to compel, to quash, or for protection. Email Glenda Hassan at glenda_hassan@txs.uscourts.gov and Mrs. Eddins at Lisa_Eddins@txs.uscourts.gov or fax her at 713-250-5213 to arrange for a pre-motion conference. Notify your adversary of the date and time for the conference.

Dated: January 8, 2025

ANDRADA & ASSOCIATES

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/s/ Lynne G. Stocker

By: Lynne G. Stocker
Attorneys for defendant SILVA

¹ The parties request that this case go to trial before the related, later-filed case of *Solares v. Burns* (1:21-cv-01349). Plaintiff Solares and Defendant Burns are requesting the same Docket Call date in that case but request that the second-filed case trail this case.

1 Dated: January 8, 2025

2 Rob Bonta
3 Attorney General of California
4 Jon S. Allin
5 Supervising Deputy Attorney General

6 */s/Jeremy Duggan (as authorized 1/8/25)*

7 Jeremy Duggan
8 Deputy Attorney General
9 Attorneys for Defendants
10 *Burnes, Gallemore, Gamboa, Garcia, Loza,*
11 *Maytubby, Munoz, and Pena*

12 Dated: January 8, 2025

13 Law Offices of Erin Darling

14 */s/Erin Darling (as authorized 1/8/25)*

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16 Erin Darling
17 Attorney for Plaintiff
18 *Dora Solares*

19 IT IS SO ORDERED.

20 Dated: January 10, 2025

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30 LEE H. ROSENTHAL
31 UNITED STATES DISTRICT JUDGE